IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA BRUNSWICK DIVISION

STEVEN MORRIS COHEN, an)
Individual,)
)
Plaintiff,)
)
vs.)
JESS M. MARTINEZ, M.D.,) CIVIL ACTION NO.
GEORGIA EMERGENCY) 2:13-CV-00167-LGW-JEG
ASSOCIATES, P.C., a Georgia)
Professional Corporation,)
GLYNN-BRUNSWICK MEMORIAL)
HOSPITAL AUTHORITY, d/b/a)
SOUTHEAST GEORGIA HEALTH)
SYSTEM-CAMDEN CAMPUS, a)
Georgia Corporation, JONATHAN	í
M. WINSTEAD, M.D., GEORGIA)
EMERGENCY PHYSICIAN)
SPECIALISTS, LLC, a Georgia)
Limited Liability Company, and)
MEMORIAL HEALTH UNIVERSITY)
MEDICAL CENTER, INC., a)
Georgia corporation,)
)
Defendants.)

STIPULATION OF DISMISSAL WITHOUT PREJUDICE

COME NOW all Parties in this action, through the signatures of their respective counsel below, and file this Stipulation of Dismissal of this action pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. The parties jointly request the dismissal of the Plaintiff's Complaint without prejudice and stipulate to the same, with each party to bear its own attorney's fees and expenses. The Plaintiff will be refiling the suit against all Defendants in Georgia State Court due to jurisdictional issues raised by Defendants. A Proposed Order of Dismissal is attached.

[Signature page follows]

Respectfully submitted this 11th day of December, 2014.

EDWARDS & RAGATZ, P.A.

/s/ Lindsay L. Tygart Thomas S. Edwards, Jr. Florida Bar No. 395821

Lindsay L. Tygart Florida Bar No. 28578

501 Riverside Avenue, Suite 601

Jacksonville, FL 32202

Attorneys for Plaintiff

(904) 399-1609

(904) 399-1615 fax

service@edwardsragatz.com

tse@edwardsragatz.com

llt@edwardsrag at z.com

lrl@edwardsragatz.com

kah@edwardsragatz.co

Admitted Pro Hac Vice

Attorneys for Plaintiff

OLIVER MANER, LLP

/s/ Andrew M. Wilkes

I. Gregory Hodges

Andrew M. Wilkes 218 West State Street

Savannah, GA 31401

(912) 236-3311

Attorney for Jonathan M. Winstead,

M.D. and Emergency Physicians

Specialists, LLC

HUNTER MACLEAN

/s/ Christopher W. Phillips

Christopher W. Phillips

Georgia Bar No. 002920

200 East St. Julian Street

Savannah, GA 31401

(912) 236-0261

Attorney for Memorial Health University

Medical Center, Inc.

BOUHAN FALLIGANT, LLP

/s/ Carlton E. Joyce

Carlton E. Joyce

Georgia Bar No. 405515

John B. Manly, Esq.

Georgia Bar No. 194011

447 Bull Street

P.O. Box 2139

Savannah, GA 31402

(912) 232-7000

(912) 233-0811 fax

cejoyce@bouhan.com

JBManly@bouhan.com

Attorneys for Defendants

Jess M. Martinez, M.D.

Georgia Emergency Associates, P.C.

HALL BOOTH SMITH, P.C.

/s/ N. Daniel Lovein

N. Daniel Lovein

3528 Darien Highway

Suite 300

Brunswick, GA 31525

(912) 554-0093

Attorney for Glynn Brunswick

Hospital Authority